



U.S. Department of Energy

Grand Junction Office
2597 B³/₄ Road
Grand Junction, CO 81503

AUG 21 2002

Mr. Richard Hampel, Chair
Weldon Spring Citizens Commission
7295 Highway 94 South
St. Charles, MO 63304

Subject: Response to Comments on Draft Long-Term Stewardship Documents for the Weldon Spring Site and Transmittal of the August 2002 Draft Long-Term Stewardship Plan

Dear Mr. Hampel:

Your group submitted comments on the subject documents to the U.S Department of Energy (DOE) in a letter to Ms. Pamela Thompson dated November 30, 2001. As you are aware, over the past year DOE's long-term stewardship initiatives have continued to evolve on a program-wide and site-specific level. This includes developing and implementing mechanisms that will effect a smooth transition of the Weldon Spring site into stewardship status for perpetual federal custody and care.

The DOE and the Weldon Spring Citizens Commission have been working together to ensure that the local community may participate in decisions affecting remediation of the Weldon Spring site. The DOE is committed to maintaining an open and productive relationship between our organizations as the site transitions to long-term stewardship. Successful transition and ongoing stewardship operations at the Weldon Spring site depend on our collaborative effort to ensure public and environmental protection and to build public confidence and trust.

The DOE has released a revised long-term stewardship (LTS) plan for concurrent review by the Commission, other stakeholders, regulators, and the public. The attached LTS plan has changed significantly from previous versions. First, the three previous stewardship documents have been consolidated into a single plan. Second, significant progress toward implementing site remedies, since the previous versions of the documents were presented, has allowed DOE to be more definitive in this LTS plan. In the plan, DOE has included general site information and specific instructions to preserve essential site knowledge for future stewards. The revised plan assumes that the user does not possess institutional knowledge of the site, is designed to provide a basic understanding of site conditions, and references source documents.

The DOE, as a team from the Weldon Spring site and the Grand Junction Office, trusts this document will help move DOE, its regulators, and stakeholders toward a final LTS plan that will ensure protection of human health and the environment well into the future. The DOE is proceeding with actions that will result in having an effective LTS plan in place for the Weldon Spring site as soon as possible. However, DOE acknowledges that the plan will be revised when the Ground Water Operable Unit is completed.

Mr. Richard Hampel

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Your continued support and comments are appreciated. Please call me at 970/248-6091 or Pam Thompson at the Weldon Spring site at 636/926-7004 with questions or concerns about these responses or the overall preparations being made to initiate stewardship oversight of the Weldon Spring site. I hope to see you at the upcoming workshop on August 28, 2002, at the Weldon Spring Interpretive Center.

Sincerely,



Ray Plienness
Deputy Manager



Pam Thompson
Project Manager, WSSRAP

Enclosure

cc w/o enclosure:

S. Mahfood, MDNR

J. Ortwerth, St. Charles County

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File: LWEL 1.1 (Garcia)

rmp/com-res wsc.doc

Response to Weldon Spring Citizens' Commission Comments
Dated November 30, 2001

Response identifiers correspond to numbered comments received from WSCC.

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|--------|--|
| WSCC 1 | The text has been modified to include specific standards.

Reference: Sections 1, 2, 2.3 and 2.4. |
| WSCC 2 | Agree. The text has been modified to include specific water quality standards that apply. The revised LTS Plan also identifies the documents that present numerical and risk-based limits for soil and other media. Please consider the revised sections, if the language is still somewhat unclear, we will work together with the Weldon Spring Citizens Commission (WSCC) to continue to improve this area.

Reference: Sections 2.3 and 2.4. |
| WSCC 3 | The number of vicinity properties is stated as 17 in the August 2002, LTS plan, which is in agreement with the RI and the ROD for the Chemical Plant area.

Reference: Section 2.2.2.2. |
| WSCC 4 | Agree. The language has been included to state the Frog Pond culverts require institutional controls (ICs), and upon completing the ICs, they will be monitored as part of the plan requirements.

Reference: Sections 2.3.1, 2.6, 3.7, and Appendix B. |
| WSCC 5 | Agree. The language has been included to identify this requirement, and ICs will be developed to ensure protection of this area.

Reference: Sections 2.3.2, 2.6, 3.7, and Appendix B |
| WSCC 6 | Agree. Text has been added to identify responsibilities for actions at the Weldon Spring Site.

Reference: Sections 1.1, 1.2, and 3.1. |
| WSCC 7 | Agree. The plan has been revised to address this concern. DOE will evaluate protectiveness, effectiveness of institutional controls, and regulatory compliance annually, in conjunction with an annual site inspection. DOE also will conduct a formal assessment of protectiveness as part of the 5-year review. DOE must obtain EPA concurrence, in consultation with the State of Missouri, to make changes to the Weldon Spring site LTS program. DOE will solicit comments from stakeholders and the public on proposed changes, as well. DOE may not |

modify the stewardship program unless EPA, in consultation with the State, agrees that changes do not reduce protectiveness.

Reference: Section 3.1.

WSCC 8 The Grand Junction Office will continue to annually request budget to fulfill the requirements of the plan through the federal budget process. DOE has not established a contingency reserve, but, with the inclusion of Weldon Spring in the greater LTS budget, DOE has greater flexibility to fund emergencies at a site within an annual appropriation.

WSCC 9 Text has not been changed yet, but DOE intends to share funding estimates in future revisions of the plan. FY03 funding levels are sufficient to continue the current groundwater-monitoring program and conduct all stewardship operations such as leachate management and cell maintenance. FY02 carry-over funds will be utilized to work toward a decision on the Groundwater Operable Unit, after which it will be possible to establish a stable long-term stewardship funding estimate.

WSCC 10 Agree. However, the August 2002, draft LTS plan indicates that the DOE Grand Junction Office is responsible for and is the point of contact for stewardship activities at the Weldon Spring site, and does not mention the Department's organizational structure.

WSCC 11 DOE will adhere to its policy of keeping local governments and citizens informed of stewardship activities. Specific outreach activities are presented in the Public Participation Plan (Appended to the LTSM Program Plan at http://www.gjo.doe.gov/programs/ltsm/general/proj_info/ltsm-progplan/ltsmpln99n.pdf). DOE removed specific discussion of programmatic stewardship philosophy from the revised Weldon Spring site LTS Plan but commits to encouraging public participation in stewardship activities at the site. That commitment certainly extends to the WSCC.

Reference: Section 3.12

WSCC 12 Agree. ICs will be verified annually. Additional actions are stipulated as part of the 5-year review. Verification procedures are offered in the revised LTS Plan. DOE expects that the section of the plan addressing ICs monitoring and maintenance will evolve as DOE gains site stewardship experience and can evaluate how effective the ICs program is at the Weldon Spring site.

Reference: Sections 3.2 and 3.7.

WSCC 13 Agree. A public availability session will be held annually during the period of the annual inspection.

Reference: Section 3.12.

- WSCC 14 DOE has completed remedial actions to be protective. The text has been enhanced to describe the systems, the required monitoring of these systems, and contingency planning appropriate if the monitoring indicates concerns. Please evaluate the text. If the language is still not sufficient, we will work together with the WSCC to continue to improve the language to adequately address requirements to ensure confidence in this area.

Reference: Section 3.9

- WSCC 15 DOE would be pleased to provide monitoring results to the WSCC. The Department is also deploying a system to provide results online, and will publish results in an annual report. For the first 2 years, the WSCC funding has been estimated to be approximately \$35,000 per year.

- WSCC 16 Reference XX was apparently a placeholder for citing the current EPA OSWER guidance for conducting 5-year reviews.

Reference: Sections 3.2.3 and 3.4

- WSCC 17 Generally, DOE will conduct risk evaluations when as-built conditions degrade or an observation indicates a risk. The August 2002, LTS plan presents a discussion of criteria that trigger a follow up inspection and criteria that will trigger contingency actions, including a possible reevaluation of risk.

Reference: Sections 3.3, 3.7, and 3.9